

BP Cherry Point Refinery  
Interview Summary

Date/Time: 6/11/2013 @ 1:00 PM

Interviewed: Mark Moore, PSM Superintendent

Scott McCreery, SOP Audit PSA

Interviewer: Javier Morales, EPA

Subject: Compliance Audit Process

I asked Scott and Mark if there are written procedures on conducting compliance audits. Scott mentions about draft procedures because there were none. But, Mark stated that the BP refinery does not lead the CAs on site, but a corporate PSM team does it. There is a corporate audit protocol policy (issued 2007) for conducting these audits. I requested a copy of the document. Mark stated that the policy was used in 2008 and 2011. Mark stated that there are corporate procedures for tracking action items called SOR procedures. Corporate has SOR verification process for verifying the completion of action items. The audit team has a meeting with leadership after the audit to agree on action item audit dates for the findings. An orange HSSE matrix is used by the Board of Directors to track the status of audit action items. Recently an action item extension process was implemented under a SOR agreement that would only apply to Category 2B not 1 and 2A.

Mark stated the corporate audits are done by a team of 27 members who conduct the audit for 3 weeks.

Mark stated that the audit findings are posted on the Share Point site for the SOR auditor to review the completed action items.

I explained to Mark that the CA report does not show all the RMP elements were reviewed such as employee participation, hot work permits, compliance audits and training. I asked if the report is just showing what was found, but excluding what was found with no issues. He believed that was the case, but could not confirm. I told Mark that in most cases there is a statement in the report about no findings with the RMP elements.

I asked Mark what PIC date meant in the report. PIC means performance improvement cycle.

Date/Time: 6/11/2013 @ 1:00 PM

Interviewed: Mark Moore, PSM Superintendent

Bob Wallace, HSSE Manager

Interviewer: Javier Morales, EPA

Subject: Management System Process

I asked Mark and Bob to explain the management system process for RMP. It was not clear in the 1000 PSO document on who was responsible for the overall RMP for development and implementation. The 1002 PSM Responsibility matrix only gives the people assigned for the RMP elements but does not identify the responsible qualified person. I told them that the RMP submitted gives Chris Sorich as the responsible person but no documents show that. Mark explained the Chris Sorich is responsible for the OCA and the submission of the RMP.

BP Cherry Point Refinery  
Interview Summary

Mark explained the 3 levels of responsibility on the 1002 PSM Responsibility matrix to show that there is accountability and leadership from the Lead Team Member to those Responsible to the work Assigned on the RMP element. I asked that Chris Sorich would be in this matrix and Mark agreed that his work would fall within the matrix such the PHA.

Mark stated that himself and Bob Wallace are the ones responsible for the RMP implementation, but bob is the main person. Mark is only responsible for Chris Sorich's work.

Mark mentioned there a 1200 RMP document that states who is responsible. A copy was provided. Procedure not referenced 1000 PSO.

Mark and Bob explained the OMS (Operations Management System) corporate system that helps manage PSM/RMP using group standards that must be followed to show conformance and performance to the standards for compliance to the PSM/RMP regulations. An OMS assessment (performance gap analysis) is done when a compliance audit is done. Bob explained that they input there performance status into the OMS system on a cycle basis. This is done for reporting purposes only to meet the OMS requirement standards.

Date/Time: 6/12/2013 @ 9:00 AM

Interviewed: Mark Moore, PSM Superintendent  
Emily Cross,

Interviewer: Javier Morales, EPA

Subject: Demonstration of SOR Action Item Tracking for Compliance Audit

Mark demonstrated the SOR Share Point system (SOR 1106) that electronically tracks action items on findings that were not closed during the 2011 Compliance Audit. Mark showed finding 1106-001-001, PSI and 1106-014-002, Operating Procedures that were closed. Mark explained that findings closed during the compliance audits will not be tracked by the SOR Share Point tracking system.

Mark explained that the SOR auditor will the review the resolution to the findings on the SOR Share Point. After review of the findings, the SOR auditor will mark the tab green for approved on the Look Ahead Report or leave is grey for not reviewed.

There are four layers of tracking" (1) Traction System accessed by Bob Wallace, (2) Look Ahead Reports accessed by Mark Moore, (3) SOR Share Point access by Mark Moore who posts the data for SOR Auditor review and approval, and (4) the BP Cherry Point Finding System accessed by Bob Wallace for upper management.

BP Cherry Point Refinery  
Interview Summary

Date/Time: 6/12/2013 @ 12:55 PM

Interviewed: Chris Sorich, Process Safety Engineer, RMP Coordinator

Interviewer: Javier Morales, EPA

Craig Haas, EPA

Subject: Incident Investigation and 5 Year Accident History

Chris is responsible for the OCA (Hazard Assessment), submission of RMP to EPA and review of the last 5 year of incidents to determine if it meets the 5 Year Accident History requirements.

Craig has to explain how they determine the Level A and B for incident classification for an incident investigation. Chris stated he would just refer to the appendix with the chart on the levels and LOPC.

I asked Chris how he determines the 5 year accident history. Chris stated that he uses the RMP Guidance Chapter 3 that was used for the 2/17/2012 incident. Chris stated that he is not aware of any written policy on determining the 5 year accident history. I told Chris that the SH 1110 Incident Investigation Procedure does not make any reference to the 5 year update requirement. I told that at other facilities I have seen them reference this.

Chris stated that the RCC (Risk Control Compliance) reviews the incidents in the last 5 years.